

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

UL LLC,

Plaintiff,

-v-

JOSHUA CALLINGTON,

Defendant.

Case No. 1:24-cv-05631
Hon. Andrea R. Wood

DECLARATION OF CONFIDENTIAL WITNESS NO. 3

[REDACTED] declare pursuant to 28 U.S.C § 1746, as follows:

1. I am located within the United States and over the age of 18 years. I am fully familiar with the facts set forth herein, which are based on my direct knowledge, or information and belief.

2. I am a Certified Social Compliance Auditor (“CSCA”) [REDACTED]

3. I voluntarily provided an emailed statement to Mr. Callington’s attorney on or about May 24, 2025, and subsequently participated in a brief telephone

interview related to the same topics on or about June 6, 2025. I subsequently authorized the following statements to be entered into the record of these proceedings on the understanding that my name and all personally identifying information will only be disclosed to the judge, and will be redacted from any publicly filed version of this document.

4. I am familiar with the representations made by Mr. Callington and others regarding the integrity of audits performed by UL in a New York Times article \ published in or around late December 2023.

5. In the course of my conversation with Mr. Callington's attorney, I explained that I also raised some of the same concerns, internally, during my time at UL. At the other certification bodies I had worked at prior, we had always covered the second shift (i.e., nighttime workers), which is common industry practice. But that wasn't being done as a routine part of our audits at UL. I specifically recall raising this concern during an internal meeting in which I stated something to the effect that I thought it was important to interview and visit during the night shift, because night shift tends to be when there is less oversight by the managers.

6. UL management was not receptive to my feedback. They seem principally concerned with ensuring auditors turn their reports in on time and utilization ensuring the auditors time was billable to the clients.

7. I do not recall receiving specific training from UL concerning where exactly data or work products produced in the course of our audits should be stored other than it should be secure as it is sensitive and confidential in nature.



8. I do not recall receiving training on explicit policies or instructions that prohibited the use of personal devices for work-related storage. Nor do I recall having been informed about any specific procedure, protocol or requirement(s) regarding the disposal or deletion of UL records that had been saved to or stored on personal devices.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Executed on June 20, 2025